

quinn emanuel trial lawyers | newyork

51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 | TEL (212) 849-7000 FAX (212) 849-7100

WRITER'S EMAIL ADDRESS
elijahturner@quinnemanuel.com

October 12, 2023

VIA ECF

Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *U.S. v. Jonathan Johnson*; 21 CR 786 (RMB)

Dear Judge Berman:

We write respectfully to propose that the Court allow defense counsel to retain Dr. Eric Goldsmith with CJA funds to perform the evaluation suggested by the Court. Dr. Goldsmith is a board certified forensic psychiatrist. He has indicated that he is available to conduct a psychiatric evaluation of our client, Jonathan Johnson, for the purpose of assisting defense counsel, the mitigation specialist, and the Probation Office in preparing a mitigation and re-entry plan tailored to Mr. Johnson's needs given his continuing struggle with addiction. Dr. Goldsmith will work at a CJA rate of \$350 per hour.

We understand that Probation Officer Almonte has submitted a request to have Mr. Johnson evaluated by a psychiatrist employed by the Bureau of Prisons. We have no objection to such an evaluation, though we are concerned that the BOP does not have the resources to do this quickly nor the experience to develop a psychologically-supported re-entry plan. Dr. Goldsmith is available on short notice to take on this work.

We continue to look for additional psychiatrists with experience and availability to take on this assignment in case the Court finds that neither the BOP psychiatrist nor Dr. Goldsmith is right for this. We have attached Dr. Goldsmith's CV for the Court's review.

Respectfully,


Elijah B. Turner

quinn emanuel urquhart & sullivan, llp

ABU DHABI | ATLANTA | AUSTIN | BEIJING | BERLIN | BOSTON | BRUSSELS | CHICAGO | DALLAS | DOHA | HAMBURG | HONG KONG | HOUSTON | LONDON | LOS ANGELES | MANNHEIM | MIAMI | MUNICH | NEUILLY-LA DEFENSE | NEW YORK | PARIS | PERTH | RIYADH | SALT LAKE CITY | SAN FRANCISCO | SEATTLE | SHANGHAI | SILICON VALLEY | TUTTGART | SYDNEY | TOKYO | WASHINGTON, DC | ZURICH

cc: AUSA Andrew Chan (via email)
US Probation Officer Maritza Almonte (via email)

Attachment: Curriculum Vitae of Dr. Eric Goldsmith.

Application granted.	
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SO ORDERED:	
Date: 10/12/23	
Richard M. Berman, U.S.D.J.	